

EXHIBIT K

ALPHA PHI ALPHA FRATERNITY
INC., *et al.*,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia.

Defendant.

**DECLARATION OF BISHOP REGINALD T. JACKSON, ON BEHALF OF
THE SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL
CHURCH**

My name is Reginald T. Jackson. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct, and are based on my personal knowledge. Under penalty of perjury, I state the following:

1. I am the presiding prelate of the Sixth Episcopal District of the African Methodist Episcopal Church (“AME Church”). The Sixth District is one of twenty districts of the AME Church and covers the entirety of the State of Georgia. The Sixth District of the AME Church is a Plaintiff in this action.

2. I was elected and consecrated the 132nd bishop of the AME Church in 2012, and have served in this position for nine years. I have served as the chairman of the Social Action Commission of the AME Church and am the current chairman of the Commission on Colleges, Universities and Seminaries.

3. The AME Church traces its roots to 1816 as the first independent Protestant denomination founded by Black people in response to segregation and discrimination in the Methodist Episcopal Church.

4. The AME Church places a strong emphasis on social service. In addition to its primary mission of religious education, AME Church has a secondary mission of service to the homeless, the imprisoned, the poor, and other needy persons.

5. Encouraging and supporting civic participation among its members is a core aspect of the AME Church's work. Advocating for the right to vote, regardless of candidate or party, and encouraging the AME Church's eligible members to vote have been priorities of the Church.

6. AME Church's activities in support of voter participation reflect the history of the civil rights march from Selma to Montgomery in Alabama. The march was organized in and began at the steps of Brown Chapel AME Church in Selma. After they were beaten by Alabama State Troopers on the Edmund

Pettus Bridge on “Bloody Sunday,” the wounded marchers fled back to the sanctuary of Brown Chapel.

7. The AME Church continues to encourage civic participation by holding “Souls to the Polls” events to transport churchgoers to polling locations during advance voting periods, registering voters for elections, hosting “Get Out the Vote” efforts to increase voter turnout, and providing food, water, encouragement, and assistance to voters waiting in lines at polling locations. Advancing voting rights and eliminating barriers to political participation that have plagued the promise of full citizenship for Black Americans since this country’s founding is a core issue that ties our members—and the communities in which they live—together.

8. There are more than 500 member-churches that are part of the Sixth District of the AME Church in Georgia. There are 36 congregations in Atlanta alone. The AME Church, the District, and our individual congregations serve as key community institutions, connecting members locally and throughout the State and its regions, fostering dialogue and fellowship, and maintaining the vibrancy and interconnectedness of our communities.

9. AME Church’s membership includes tens of thousands of Black Georgians who are registered voters, including in Metro Atlanta, Augusta and the surrounding counties, Southwestern Georgia (including the counties in and

around Columbus and Albany), and other counties across the state. Several congregants are named Plaintiffs in this case.

10. There are approximately 60 congregations located in and around the areas that comprise new Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134), including, without limitation, in Fayette County, Spalding County, Henry County, Newton County, and other counties in the area. Many, if not all, of these churches have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134).

- a. For example, Cleveland Chapel AME Church, located in new Senate District 17, is one of our member congregations in Hampton, Georgia. Cleveland Chapel AME is in southwestern Henry County, in the Metro Atlanta area, where the population of Black Georgians has grown significantly over the past decade.
- b. For another example, Rising Star Missionary Baptist Church, located in Senate District 16, is one of our member congregations in Griffin, Georgia. Rising Star Missionary Baptist is in southwestern Spalding

County, just on the outskirts of Metro Atlanta, where the population of Black Georgians has also grown since 2010.

11. Numerous AME churches are also located in and around the area that comprises new Georgia Senate District 23 (as well as the new House Districts drawn in and/or around the same area, such as House Districts 128 and 133), including, without limitation, in Richmond County (which includes Augusta) as well as various nearby counties, such as Burke County, Jefferson County, and Baldwin County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 23 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 128 and 133).

a. For example, Spring Bethel AME Church, located in Senate District 23, is one of our member congregations in Louisville, Georgia.

Spring Bethel AME Church is located in Jefferson County.

b. Flipper Chapel AME Church, located in House District 133, is one of our member congregations in Milledgeville, Georgia. Flipper Chapel AME is in central Baldwin County.

12. There are also numerous AME churches established in and around the area that comprises new Georgia House Districts 171 and 173 (as well as other new House Districts drawn in and/or around the same area), including, without

limitation, in Dougherty County (which includes Albany) as well as various nearby counties, including, among a number of others, Mitchell County and Thomas County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia House Districts 171 and 173.

- a. For example, St. Peter AME Church, located in House District 171, is one of our member congregations in Camilla, Georgia. St. Peter AME is in Mitchell County, a part of southwest Georgia.

13. Members of AME Church include Black registered voters who I understand reside in the new State Senate and State House districts discussed above , but who would reside in the illustrative additional majority-Black State Senate and State House districts presented by Plaintiffs in this case that could have and should have been drawn in the above-discussed areas .

14. The new maps directly affect AME Church's advocacy efforts by undermining the ability of Black Georgians, including the Church's members, to elect representatives of their choice.

15. AME Church will be forced to divert resources from its broader voter registration and community empowerment initiatives to areas where Black voting strength has been unlawfully watered down in order to protect the representation and interests of its members.

16. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 31st day of December, 2021,

By: /s/ [Signature]

Sherman Lofton, Jr.